

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

UNITED STATES OF AMERICA,)	
)	
Petitioner,)	
)	
v.)	No. 4:24-cv-92
)	
ALLIANCE PARK LLC; BRICKYARD)	
PLACE LLC; CENTEX)	
MANAGEMENT, LLC; DEERWOOD)	
POINT LLC; HONEY PARK LLC;)	
MARIAH MARIE LLC; UNION GL)	
PARK LLC; GOVERNORS)	
MANAGEMENT LLC; and)	
THE PRUDENTIAL REALTY LLC;)	
)	
Respondents.)	

**PETITION FOR
SUMMARY ENFORCEMENT OF CIVIL INVESTIGATIVE DEMANDS**

The United States of America respectfully petitions the Court, pursuant to 31 U.S.C. § 3733(j)(1), to issue an order enforcing Civil Investigative Demand (CID) Nos. 2023-012 (Exhibit 1), 2023-013 (Exhibit 2), 2023-014 (Exhibit 3), 2023-015 (Exhibit 4), 2023-016 (Exhibit 5), 2023-019 (Exhibit 6), 2023-022 (Exhibit 7), 2023-023 (Exhibit 8), and 2023-024 (Exhibit 9). The United States requests that the Court compel the recipients of the demands, Respondents Alliance Park LLC; Brickyard Place LLC; Centex Management, LLC; Deerwood Point LLC; Honey Park LLC; Mariah Marie LLC; Union GL Park LLC; Governors Management LLC; and The Prudential Realty LLC, to comply with the interrogatories and requests for documents contained in the aforementioned CIDs, supported by sworn certificates of compliance. The United States is entitled to enforcement of the CIDs because the

CIDs seek information relevant to a pending investigation under the False Claims Act, and Respondents have not raised any valid defenses to enforcement of the CIDs.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this petition under 31 U.S.C. §§ 3733(j)(1) and (j)(5), and 28 U.S.C. § 1345.

2. Venue is proper under 31 U.S.C. § 3733(j) because Respondents may be found or transact business within this judicial district.

PARTIES

3. Petitioner is the United States of America, acting through the United States Attorney for the Southern District of Georgia. The Attorney General delegated the authority to issue CIDs under 31 U.S.C. § 3733(a)(1) to the United States Attorney through 28 C.F.R. Part 0, Subpart Y, App'x, Dir. No. 1-15.

4. Respondent Alliance Park LLC (Alliance Park) is a domestic limited liability company that identifies its principal office as P.O. Box 804, Allenhurst, GA, 31301.

5. Respondent Brickyard Place LLC (Brickyard Place) is a domestic limited liability company that identifies its principal office as 2625 Piedmont Rd., NE, No. 56 412, Atlanta, GA, 30324.

6. Respondent Centex Management LLC (Centex Management) is a domestic limited liability company that identifies its principal office as P.O. Box 32, Allenhurst, GA, 31301.

7. Respondent Deerwood Point LLC (Deerwood Point) is a domestic limited

liability company that identifies its principal office as 5501 Abercorn St., Unit 5-201, Savannah, GA, 31405.

8. Respondent Honey Park LLC (Honey Park) is a domestic limited liability company that identifies its principal office as 2625 Piedmont Rd., NE, No. 56-412, Atlanta, GA, 30324.

9. Respondent Mariah Marie LLC (Mariah Marie) is a domestic limited liability company that identifies its principal office as 5710 Ogeechee Rd., No. 200-197, Savannah, GA, 31405.

10. Respondent Union GL Park LLC (Union GL Park) is a domestic limited liability company that identifies its principal office as 1055 Howell Mill Road, 8th Floor, No. 114, Atlanta, GA, 30318.

11. Respondent Governors Management LLC (Governors Management) is a domestic limited liability company that identifies its principal office as 60 Exchange Street, Suite C3, No 248, Richmond Hill, GA, 31324.

12. Respondent The Prudential Realty LLC (The Prudential Realty) is a domestic limited liability company that identifies its principal office as 5501 Abercorn St., Unit 5-201, Savannah, GA, 31405.

ISSUANCE AND SERVICE OF THE CIDs

13. The United States Attorney for the Southern District of Georgia is conducting a civil investigation under the False Claims Act to determine whether House of Prayer Christian Churches of America, Inc., House of Prayer Bible Seminary, or individuals acting on their behalf submitted or caused the submission of false claims

for veterans' education and housing benefits offered through the Department of Veterans Affairs.

14. As part of that investigation, the United States Attorney issued the following CIDs on October 19, 2023:

- a. CID No. 2023-012 to Alliance Park,
- b. CID No. 2023-013 to Brickyard Place,
- c. CID No. 2023-014 to Centex Management,
- d. CID No. 2023-015 to Deerwood Point,
- e. CID No. 2023-016 to Honey Park,
- f. CID No. 2023-019 to Mariah Marie, and.
- g. CID No. 2023-022 to Union GL Park.

15. As part of the same investigation, the United States Attorney issued the following CIDs on November 1, 2023:

- a. CID No. 2023-023 to Governors Management and
- b. CID No. 2023-024 to The Prudential Realty.

16. Alliance Park was served with CID No. 2023-012 through its registered agent, Northwest Registered Agent Service, Inc., 8735 Dunwoody Place, Suite N, Atlanta, GA 30350, on December 15, 2023. *See* 31 U.S.C. § 3733(d)(1)(A).

17. Brickyard Place was served with CID No. 2023-013 by depositing an executed copy by registered/certified mail, return receipt requested, addressed to Brickyard Place at its principal office or place of business on October 25, 2023. *See* 31 U.S.C. § 3733(d)(1)(C). The CID was received on October 28, 2023.

18. Centex Management was served with CID No. 2023-014 through its registered agent, United States Corporation Agents, Inc., 11175 Cicero Drive, Suite 100, Alpharetta, GA 30022, on December 15, 2023. *See* 31 U.S.C. § 3733(d)(1)(A).

19. Deerwood Point was served with CID No. 2023-015 by depositing an executed copy by registered/certified mail, return receipt requested, addressed to Deerwood Point at its principal office or place of business on October 25, 2023. *See* 31 U.S.C. § 3733(d)(1)(C). The CID was received on October 27, 2023.

20. Honey Park was served with CID No. 2023-016 by depositing an executed copy by registered/certified mail, return receipt requested, addressed to Honey Park at its principal office or place of business on October 25, 2023. *See* 31 U.S.C. § 3733(d)(1)(C). The CID was received on October 28, 2023.

21. Mariah Marie was served with CID No. 2023-019 through its registered agent, Registered Agent Solutions, Inc., 900 Old Roswell Lakes Parkway, Suite 310, Roswell, GA 30076, on November 27, 2023. *See* 31 U.S.C. § 3733(d)(1)(A).

22. Union GL Park was served with CID No. 2023-022 by depositing an executed copy by registered/certified mail, return receipt requested, addressed to Union GL Park at its principal office or place of business on October 25, 2023. *See* 31 U.S.C. § 3733(d)(1)(C). The CID was received on November 10, 2023.

23. Governors Management was served with CID No. 2023-23 through its registered agent, Registered Agent Solutions, Inc., 900 Old Roswell Lakes Parkway, Suite 310, Roswell, GA 30076, on February 29, 2024. *See* 31 U.S.C. § 3733(d)(1)(A).

24. The Prudential Realty was served with CID No. 2023-24 through its registered

agent, Registered Agent Solutions, Inc., 900 Old Roswell Lakes Parkway, Suite 310, Roswell, GA 30076, on February 29, 2024. *See* 31 U.S.C. § 3733(d)(1)(A).

RESPONDENTS REFUSE TO RESPOND

25. On February 1, 2024, an attorney representing Respondents contacted the United States regarding CID Nos. 2023-012, 2023-013, 2023-014, 2023-015, 2023-016, 2023-019, 2023-022, 2023-023, and 2023-024.

26. Respondents indicated, through counsel, that, with the exception of a single responsive document held by The Prudential Realty, the only documents that exist responsive to the CIDs are public filings, which Respondents objected to producing on the grounds that they are equally available to the United States.

27. Respondents refused to respond to the interrogatories contained in the CIDs due to the Fifth Amendment rights of Anthony Oloans, also represented by the same attorney as the Respondents, and because counsel believed the CIDs to be an inappropriate use of the United States' CID power.

28. Despite requests, The Prudential Realty to date has not produced even the non-public document responsive to the document requests.

29. Respondents have objected to certifying their compliance with the document requests contained in the CIDs as required by 31 U.S.C. § 3733(f)(1), again citing the Fifth Amendment and an alleged abuse of the United States' CID power.

30. As corporate entities, the Respondents have no right against self-incrimination under the Fifth Amendment. What is more, aside from Centex Management, none of the public filings for Respondents indicate Anthony Oloans currently is affiliated with

those entities. In any event, Respondents are not required to designate Anthony Oloans as the individual who answers and certifies compliance with the CIDs.

31. Further, the CIDs were issued lawfully and for appropriate purposes as part of a civil investigation under the False Claims Act.

PRAYER FOR RELIEF

WHEREFORE, petitioner, the United States of America, respectfully requests that this Court order respondents Alliance Park, Brickyard Place, Centex Management, Deerwood Point, Honey Park, Mariah Marie, Union GL Park, Governors Management, and The Prudential Realty to:

- a) Serve full and complete responses to the interrogatories and document requests contained in CID Nos. 2023-012, 2023-013, 2023-014, 2023-015, 2023-016, 2023-019, 2023-022, 2023-023, and 2023-024, supported by the sworn certificates required by 31 U.S.C. § 3733(f)(1) and (g); and
- b) Grant such other relief as this Court determines is just and proper.

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